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To Whom It May Concern:

This letter is in reference to the Proposed Rule making for "Occupational Therapy Licensure Regarding Continuing Competency".

As licensed Occupational Therapists in the State, we agree with the need to have guidelines for continued professional competence to assure consumer safety. In assessing the options available, we are concerned that the limited choices will have a negative impact on the availability of practitioners to meet the growing needs of the consumer. These stringent requirements may result in Occupational Therapists choosing to leave the profession. There is a portion of the workforce that practices Occupational Therapy on a part-time basis balancing the needs of family and work. Many of these practitioners are excellent clinicians who may choose to provide service to varying degrees throughout their career, moving from independent practice, to part time practice and full time practice. These critical members of the workforce would most likely be adversely impacted with these changes. The loss of these vital clinicians would have a negative impact on the consumer access to OT services and the profession itself.

In our opinion the options presented outside of the continuing education coursework, is heavily academic focused and may not meet the needs of all the treating clinicians. The options presented do not reflect all the options that have been approved by the American Occupational Therapy Association, in the document entitled "Model Continuing Education Guidelines for Occupational Therapists and Occupational Therapy Assistants: A Resource for State Regulatory Boards" (November, 2003). In this document the American Occupational Therapy Association identifies a number of other choices which they recognize as meeting continued clinical competence. Each of these items is separate from continuing education coursework.

Independent study with the licensee describing how this activity relates to their roles and responsibilities has been identified by AOTA as an activity related to competence. This includes reading books, reviewing journal articles and viewing videos. In an article by Lysaght, R.M., titled "The impact of work environment on the competency maintenance activities of occupational therapists" confirms that competency is primarily driven through the personal commitment and motivation of the therapist. This personal commitment is directly linked to independent study and should not be ignored. AOTA and NBCOT recognize this critical aspect of professional development. NBCOT has published a form that can be used to document these activities. This type of independent study will allow flexibility, is self directed and would address the issue of competency for a wide spectrum of the workforce.

Under the area of presentations, we believe that in accordance with the guidelines presented by the American Occupational Therapy Association, local in-services and presentations that speak directly to the current practice of the individual enhances clinical competency. This has been substantiated in an article titled "Evaluation of the impact of mandatory and voluntary continuing professional education on continuing competency of Florida Licensed Occupational Therapy practitioners" published in 1997 by Anderson, which highlights activities impacting competency include participating in on-the-job-training. The portion of these activities that is not reflected in the current proposal is the value of these activities for the individual who is preparing and presenting the information. We believe that the individual should receive credit for these activities within the 6 additional unit requirements.

AOTA recognizes that an individual professional development plan which includes a formal documented process also demonstrates a commitment to clinical competency. These types of activities relate to the intrinsic drive of the individual clinician. NBCOT recognizes this and has formal documents that would walk the clinician through this process and provide documentation to support these activities.

Other Boards such as the Maryland Board offers 23 options for maintaining professional competency as opposed to the 6 options proposed by the Pennsylvania Board. Maryland includes items such as informal self study; employer provided in-service training, development of instructional materials, poster presentations, professional study groups, formal self study and volunteer on professional boards or committees. The Maryland Board appears to support the wide spectrum of practitioners in the State and encourages self directed competency programs.

We are recommending that the Pennsylvania Board consider increasing the variety of competency activities that would be accepted in the required category outside of attendance at continuing education courses. Specifically we recommend the addition of self study, credit for the presenter in providing education to others in the work and educational setting, individual professional development plans, and those activities already recognized by the Maryland Board.

Thank you for considering our recommendations. We would be available to discuss these recommendations with you upon request.

Sincerely,

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## References

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